

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

MARGARET A. ROBISON

v. CONCORD MANAGEMENT /  
MEADOWOOD PARK Apartments

Case:2:14-cv-14808  
Judge: Cohn, Avern  
MJ: Hluchaniuk, Michael J.  
Filed: 12-17-2014 At 11:16 AM  
CMP ROBISON V CONCORD MANAGEMENT, E  
T AL (EB)

Defendant(s).

COMPLAINT

- I. Defendant(s). Print the full name for each defendant. If there are more defendants, use additional pages to provide their names.

Name of Defendant(s)

1.

2.

3.

4.

5.

- II. Statement of claim. Briefly state the facts of your case. Describe how each defendant is involved, and exactly what each defendant did, or failed to do. Include names of any other persons involved, dates, and places. You may use additional paper if necessary.

Please see attached

III. Relief. Briefly state exactly what you want the court to do for you.

- 1) AWARD DAMAGES IN EXCESS OF \$100,000 FOR  
THE VIOLATIONS SPECIFIED IN THE COMPLAINT.
- 2). ENTER AN ORDER REQUIRING DEFENDANTS TO  
MAINTAIN THE PARKING ACCOMMODATION FOR SO  
LONG AS I AM A PRESIDENT

IV. Additional Information. – Briefly enter any additional information, you may use additional paper.

V. Demand for Jury Trial. Check this box if you want your case to be decided by a jury, instead of a judge.

Plaintiff demands a jury trial on all issues.

Dated: December 15, 2014

Margaret A Robison

Plaintiff's Signature

MARGARET A. ROBISON

Plaintiff's Printed Name

27084 MEADOWOOD DR #203

Street Address

WIXOM MI 48393

City, State, Zip Code

248.773.7790

Telephone Number

MAR62253@AOL.COM

E-mail Address

U.S. District Court  
Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 West Lafayette Blvd.  
Detroit, Michigan 48226

MARGARET A. ROBISON

Plaintiff,

Case No.:  
HON:

vs.

CONCORD MANAGEMENT &  
MEADOWOOD PARK APARTMENTS

Defendants

Margaret A. Robison, (Plaintiff) 27084 Meadowood Drive #203 Wixom, Michigan 48393. Concord Management Limited, 21800 Haggerty Road, Suite #220, Northville, Michigan 48167. Concord Management/Meadowood Park Apartments 1551 Sandspur Maitland, Florida 32751(Defendants) and Meadowood Park Apartments, 27059 Meadowood Drive, Wixom, Michigan 48393 (Defendants).

1).On November 15, 2013 9:30p.m., after meeting with Representative Clint Kesto, I came home to find another tenant parked in my “reserved” (not handicapped) parking space. Margaret A. Robison called maintenance man, Mr. George Moses, to come and get the tenant to move their car. Mr. George Moses also had to call Ms. Lisa Osler (manager) to find out whom the car belong to. The tenant was upset at Margaret A. Robison for having her to move her car in a “reserved” spot. Mr. George Moses then stated to Margaret A. Robison, “You have to play nice with the new neighbor.” Margaret A. Robison has been denied at every requests for a “handicapped parking sign for resident only” with permit because Concord Management stated that the sign is “illegal” to have.

2).Concord Management have ignored all Margaret A. Robison requests for handicapped parking where she could be safe and protected by the police/law. Concord Management requested that she pay from \$250.00 to \$1,000 to \$1,600 depending on the season for a curb cut-out. Without handicapped parking, it put Margaret A. Robison safety at risk.

3).According to the City of Wixom, Mr. Dennis Smith, Building Inspector, there should have been handicapped accessibility for 27084-203 building according to the Disability Act of 1976. The original design was approved to have handicapped parking at 27084-203 entrance. Any changes that Concord Management made after, should have gone back to the city of Wixom for approval, and they did not. Concord Management failed all guidelines according to local, state and federal law. Margaret A. Robison is a resident of Wixom and must follow all the ordinances and laws, therefore, Margaret A. Robison should also be protected too, by all the ordinances and laws by the city of Wixom.

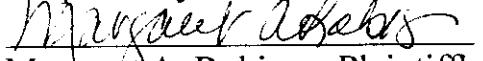
4).Concord Management and Meadowood Park Apts., went against Margaret A. Robison privacy rights. According to the guidelines, all Concord Management needed from Margaret A. Robison for handicapped parking, was the blue handicapped placard (in which they had in 2008 and ran it through the state of Michigan for verification). Concord Management forced Margaret A. Robison to reveal medical records on why she is handicapped. December 4, 2013 Robert Shaner, Chiropractor, had to reveal Margaret A. Robison disability impairments. December 2, 2013 Sean P. Coyle, M.D., had to reveal Margaret A. Robison disability impairments. Margaret A. Robison has been disabled since 1990.

5).As a result, Concord Management and Meadowood Park Apts. failed to protect and provide according the Disability Act of 1976, Elliott Larsen Act, Fair Housing Act, the harassment towards Margaret A. Robison should have never happened. Margaret A. Robison could not enjoy the living accommodation as other tenants. Margaret A. Robison was constantly harassed by deliveries, tenants, moving companies, any time that she left her apartment.

Wherefore, Plaintiff Margaret A. Robison demands a judgment against Defendants, Concord Management and Meadowood Park Apartments, for damages in excess of \$100,000 plus court costs, permanent handicapped parking with permit as long as she resides at Meadowood Park Apts., for zero tolerance of harassment towards a handicapped disabled women, failure to provide accommodation(housing), HIPPA violations.

dated: December 15, 2014

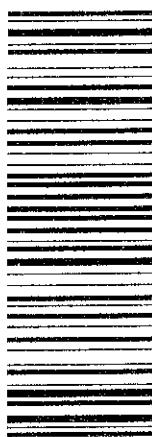
Respectfully submitted,

  
Margaret A. Robison, Plaintiff's  
signature

  
Plaintiff's printed name

RECORDED  
DETROIT, MI  
12/15/14  
48226

7014 0510 0000 1235 0661



U.S. POSTAGE  
DETROIT,  
MI 48226  
DEC 15 2014  
AMERICAN AIRLINES

\$9.00  
00057661-04

FILED

DEC 17 2014

CLERK'S OFFICE-DETROIT  
U.S. DISTRICT COURT

U.S. District Court

Benton Harbor, Michigan

Middle District U.S. Courthouse

231 W. Lafayette Blvd.

Detroit, Michigan

18226

Attn: Mr. Dennis Wasser - Court Admin.

Court of Law

## New Lawsuit Check List

Instructions: Put a check mark in the box next to each appropriate entry to be sure you have all the required documents.

<input checked="" type="checkbox"/>	<b>Two (2) completed Civil Cover Sheets.</b>  Enter the number of defendants named in your lawsuit in the blank below, add 2 and then enter the total in the blank.  $\underline{2} \quad + 2 = \underline{4}$ <b>Complaints.</b> <small># of Defendants                      Total</small>		  Case: 2:14-cv-14808 Judge: Cohn, Avern MJ: Hluchaniuk, Michael J. Filed: 12-17-2014 At 11:16 AM <b>CMP ROBISON V CONCORD MANAGEMENT, ET AL (EB)</b>	
<input checked="" type="checkbox"/>	Received by Clerk: <u>EB</u> Addresses are complete: <u>✓</u>			
<input type="checkbox"/>	If any of your defendants are <b>government agencies</b> : Provide two (2) extra copies of the <b>complaint</b> for the U.S. Attorney and the Attorney General.			
<b>If Paying The Filing Fee:</b>		<b>If Asking That The Filing Fee Be Waived:</b>		
<input type="checkbox"/>	Current new civil action filing fee is attached.  Fees may be paid by check or money order made out to:  <i>Clerk, U.S. District Court</i>		<input checked="" type="checkbox"/>	<b>Two (2) completed Application to Proceed in District Court without Prepaying Fees or Costs forms.</b>  <u>EB</u> Received by Clerk: <u>EB</u>
<b>Select the Method of Service you will employ to notify your defendants:</b>				
<b>Service via Summons by Self</b>		<b>Service by U.S. Marshal</b> <small>(Only available if fee is waived)</small>		<b>Service via Waiver of Summons</b> <small>(U.S. Government cannot be a defendant)</small>
<input checked="" type="checkbox"/>	Two (2) completed summonses for each defendant including each defendant's name and address.  <u>EB</u>		<input checked="" type="checkbox"/>	Two (2) completed USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint.  Two (2) completed Request for Service by U.S. Marshal form.  <u>EB</u> Received by Clerk: _____
			<input type="checkbox"/>	You need not submit any forms regarding the Waiver of Summons to the Clerk.  <u>Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:</u> <ul style="list-style-type: none"> <li>• One (1) Notice of a Lawsuit and Request to Waive Service of a Summons form per defendant.</li> <li>• Two (2) Waiver of the Service of Summons forms per defendant.</li> </ul> Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.

Clerk's Office Use Only

Note any deficiencies here:

*Civil cover sheet unsigned*

## CIVIL COVER SHEET

County in which action arose

OAKLAND

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

MARGARET A. ROBISON

(b) County of Residence of First Listed Plaintiff OAKLAND  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

CONCORD MANAGEMENT/PHEASANTWOODS  
PARK APARTMENTS ① WAYNE, (LAWYER)

County of Residence of First Listed Defendant

STATE OF MINNESOTA CASE NUMBER

Case: 2:14-cv-14808

Judge: Cohn, Avern

MJ: Hluchaniuk, Michael J.

Filed: 12-17-2014 At 11:16 AM

CMP ROBISON V CONCORD MANAGEMENT, ET AL (EB)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- |  |  |
|--|--|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)   |

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input checked="" type="checkbox"/>
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 360 Other Personal Injury	<b>LABOR</b>	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 160 Stockholders' Suits		<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 190 Other Contract		<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 891 Agricultural Acts
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<b>Habeas Corpus:</b>	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 865 RSI (405(g))	
<input type="checkbox"/> 290 All Other Real Property	<input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other	<b>Other:</b>	<b>FEDERAL TAX SUITS</b>	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		
			<b>IMMIGRATION</b>	
			<input type="checkbox"/> 462 Naturalization Application	
			<input type="checkbox"/> 465 Other Immigration Actions	

## V. ORIGIN (Place an "X" in One Box Only)

- |   |   |  |   |  |   |
|---|---|--|---|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) | <input type="checkbox"/> 6 Multidistrict Litigation |
|---|---|--|---|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

AMERICANS WITH DISABILITIES ACT/HIPAA

Brief description of cause:

FAILURE TO PROVIDE ACCOMMODATIONS (HOUSING) - HIPAA VIOLATIONS

## VI. CAUSE OF ACTION

 CHECK IF THIS IS A CLASS ACTION      DEMAND \$100,000+      CHECK YES only if demanded in complaint:  
UNDER RULE 23, F.R.Cv.P.      JURY DEMAND:  Yes  No

## VII. REQUESTED IN COMPLAINT:

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFFP

JUDGE

MAG. JUDGE

## PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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